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June 13, 2022

Via ECF

Hon. Magistrate Andre M. Espinosa, U.S.M.J. United States District Court, District of New Jersey 50 Walnut Street, Room MLK 2D Newark, New Jersey 07102

Re: Campaniello-Cason et al v. O'Reilly

Case No.: 2:20-cv-03381-MCA-LDW

Case Management Conference Call: June 15, 2022

Dear Magistrate Judge Espinosa:

This firm represents Defendant, Kevin O'Reilly, ("Defendant") in the above-captioned matter. I am not able to participate in the conference call rescheduled from June 10, 2022 to June 15, 2022 as a result of a previous family commitment for which I will be absent from the office on that date.

After the June 10, 2022 Conference Call, I sent an email to counsel for the Plaintiff informing that the call with the Court was convened as originally scheduled although no substantive matters were discussed due to Plaintiff's absence. I advised that the Defendant asked the Court to permit Defendant to proceed directly to motions with the additional motion to suppress the Plaintiff's expert reports and preclude their testimony. I advised that the Court would direct a date certain for the submission of a revised and final Pre-Trial Order to include this motion and any other final matters. I also requested counsel to send me the word version of the Pre-Trial Order such that requisite edits could be made and that the Court required the identity of edits only and not a redline version. I also advised in that same email of my unavailability next week due to deadlines and a personal commitment.

BITTIGER ELIAS TRIOLO & DIEHL P.C. Campaniello-Cason et al v. O'Reilly June 13, 2022

The Defendant's position remains as represented to the Court on June 10, 2022 and thereafter to Plaintiff's counsel. The Defendant is not deposing Plaintiff's experts or submitting expert reports.

Please do not hesitate to contact this office if Your Honor has any questions or concerns with regard to this matter. As always, the Court's courtesies and consideration of this matter are greatly appreciated.

Respectfully submitted,

PJT/alr

cc: Norrinda Hayat, Esq. (via ECF and electronic mail) Kevin O'Reilly (via electronic mail)